ORIGINAL

NORTEL NETWORKS

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Raymond L. Strassburger
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August 19, 1999

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20544

EX PARTE NOTICE

Re: ***Ex Parte File,* In the Matter of *Deployment of Wireline Services Offering Advanced Telecommunications Capability* CC Docket No. 98-147; *Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion* CC Docket No. 98-147; *Second Further Notice of Proposed Rulemaking in Matter of Implementation of the Local Competition Provisions in the Telecommunications Act of 1996* CC Docket No. 99-70**

Dear Ms. Salas:

Pursuant to the Commission's rules this letter provides notice that on August 18, 1999, Wayne Getchell, Nabil Gebrael, Julie Hedlund, and the undersigned all of Nortel Networks met with FCC staff members Stagg Newman, Doug Sicker, Vincent Paladini, Michael Jacobs, Jerome Stanshine, Margaret Egler, and Staci Pies. The subject of the meeting was the referenced proceedings. The meeting was convened at the request of FCC staff. The discussion was based on the enclosed presentations, copies of which were left with each of the FCC attendees.

If you have any questions, please call me.

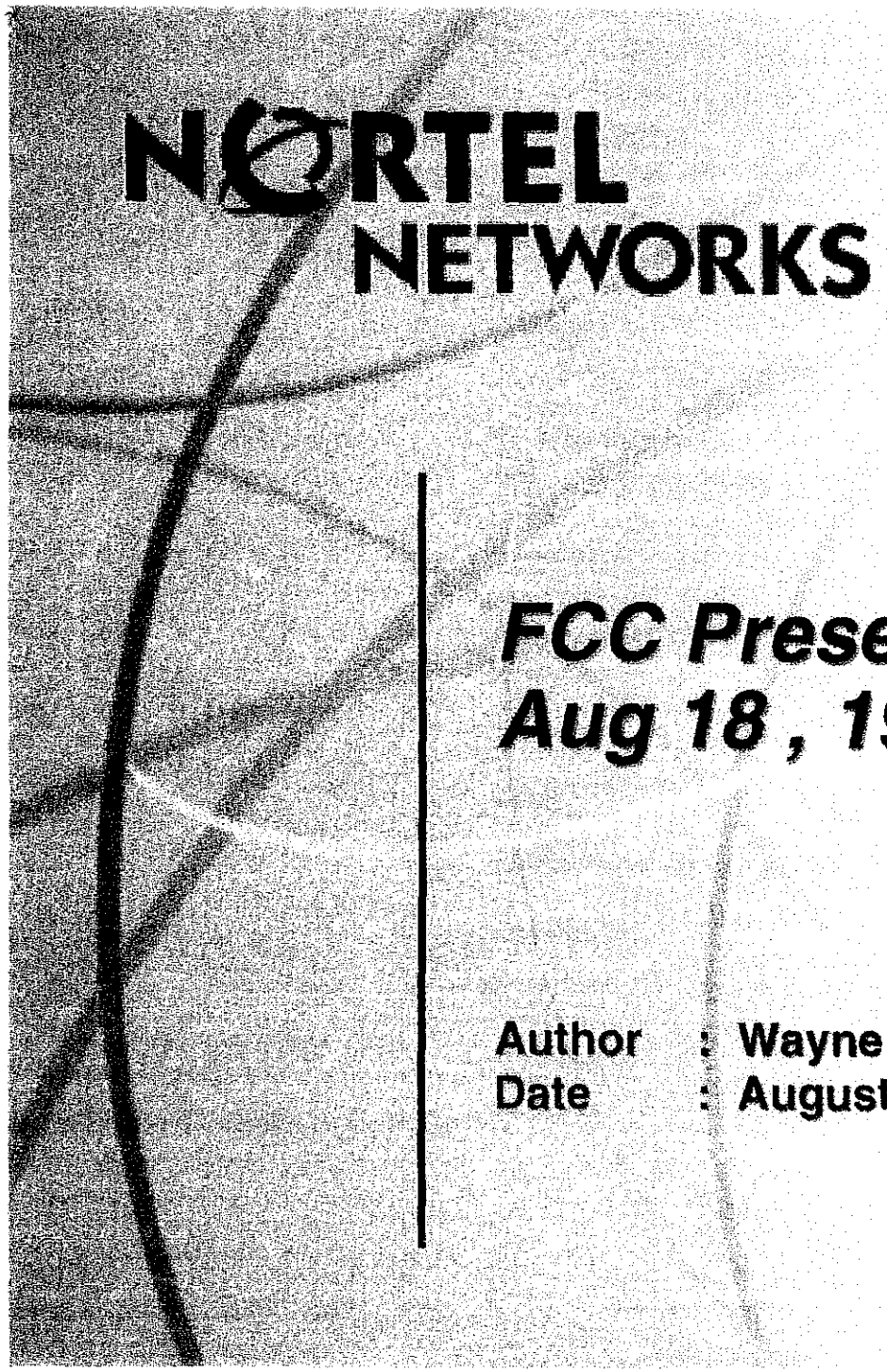
Sincerely,

Raymond L. Strassburger
Director, Government Relations-Telecom, Internet and
Advanced Technology Policy

RLS/jh

Enclosures

cc: Stagg Newman, Office of Engineering and Technology
Doug Sicker, Office of Engineering and Technology
Jerome Stanshine, Office of Engineering and Technology
Vincent Paladini, Common Carrier Bureau
Michael Jacobs, Common Carrier Bureau
Margaret Egler, Common Carrier Bureau



FCC Presentation Aug 18 , 1999

Author : Wayne Getchell
Date : August '99

Loop Sharing Options

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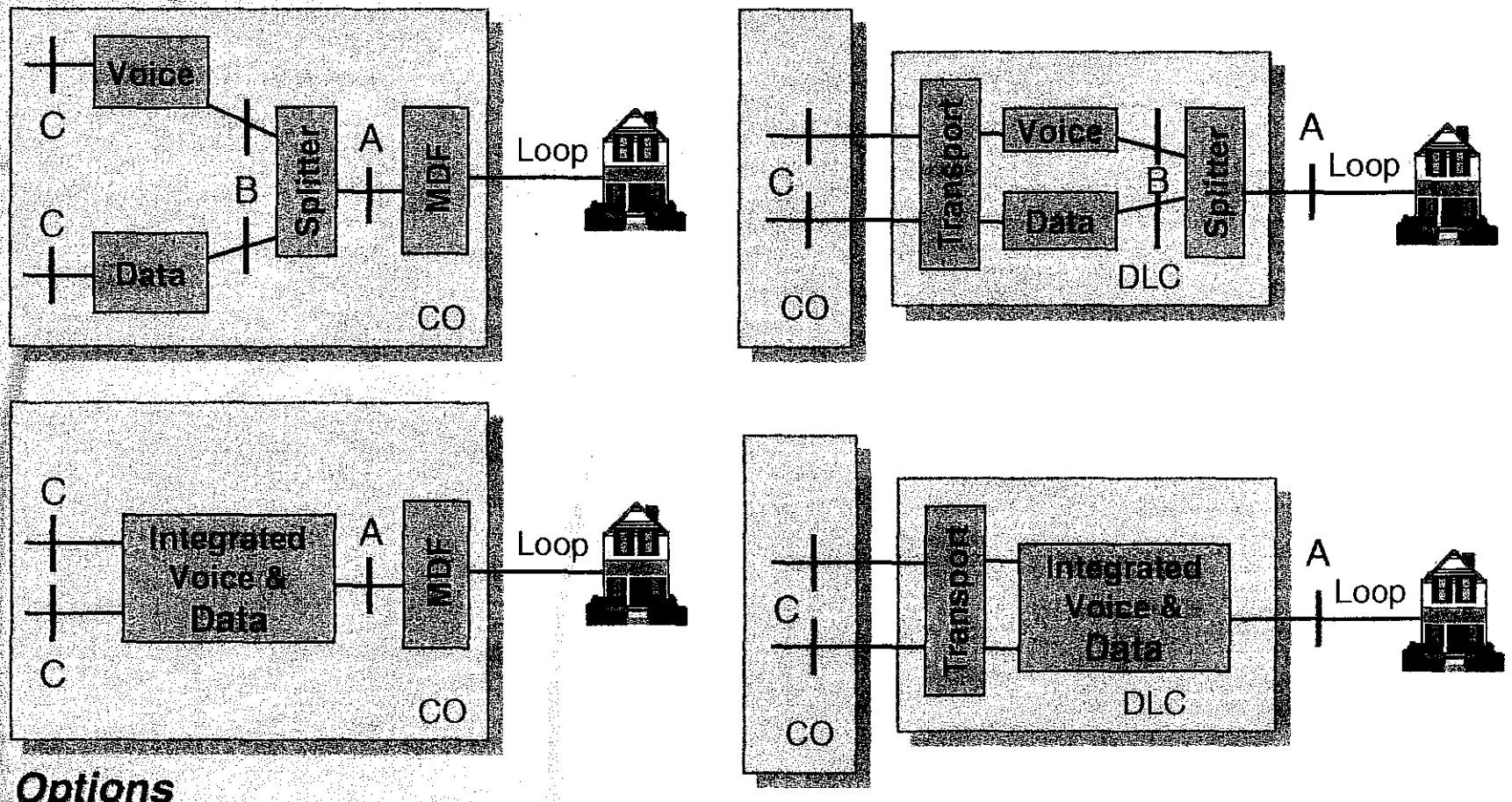

Options

A Loop Owner Wholesales Loop

B Loop Owner Wholesales Spectrum

C Loop Owner Wholesales Service

Sharing Ownership and Issues

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	Loop Owner	Competitor	Issues
A	• Loop • Maint / Quality • SLA	• Tie Cabling • All voice/data terminating equip. • Aggregation & routers at CO	• CO & CLE testing limited through POTS splitter • CLE - duplication of equipment and/or facilities, Cabinetry, Access mux, Transport etc. - space and cost constraints.
B	• Loop • Splitter • Maint / Quality • SLA	• Tie Cabling to voice/data loop terminating equip. • All voice/data term equipment • Aggregation & routers at CO	• Fault diagnostic and test complications • CLE - duplication of equipment and/ or facilities, Access mux, Transport etc. - space and cost constraints.
C	• Loop • Splitter • Maint / Quality • SLA • Loop terminating equipment	• Aggregation & routers at CO	• CLE - duplication of equipment and /or facilities, Access mux, Transport etc. - space and cost constraints. • CLE - duplication of facilities, Access mux, Transport etc. - space and cost constraints.

Splitters

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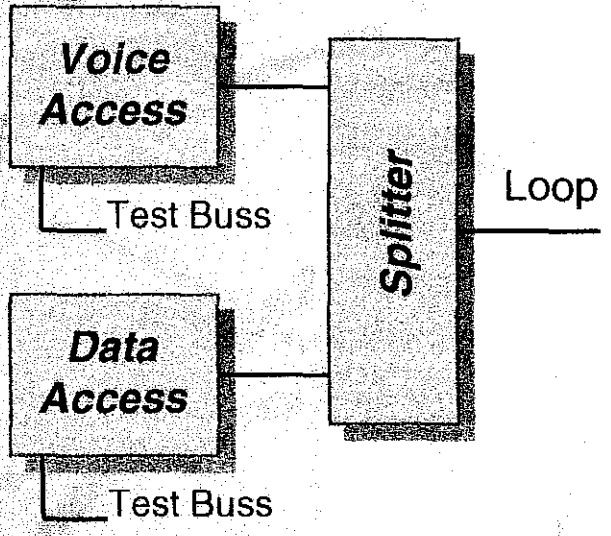
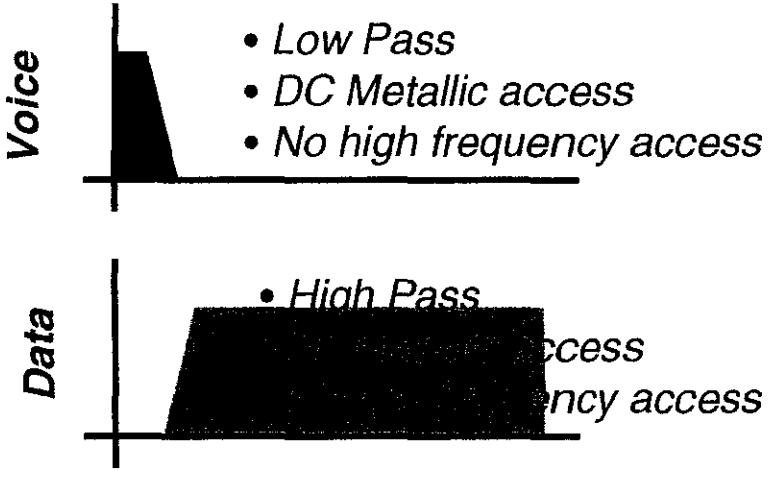
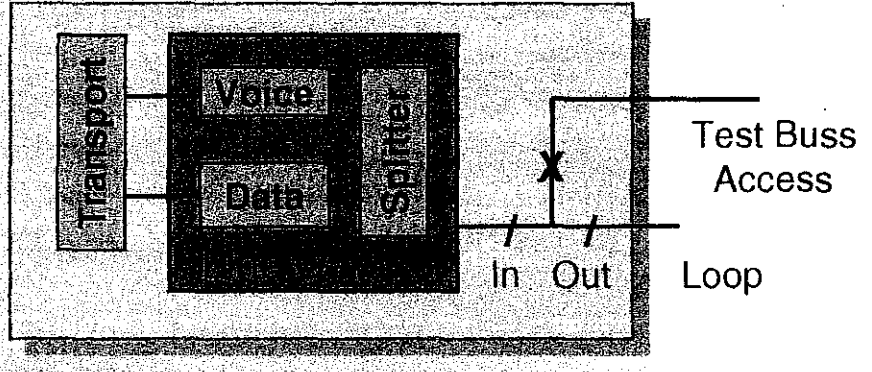
Passive LC Voice / Data Splitter







Integrated Voice & Data Access

Integrated Voice Data Test Access

- Full frequency test access to loop
- Metallic access
- Test IN and test OUT capability

Loop Sharing OA&M Architecture

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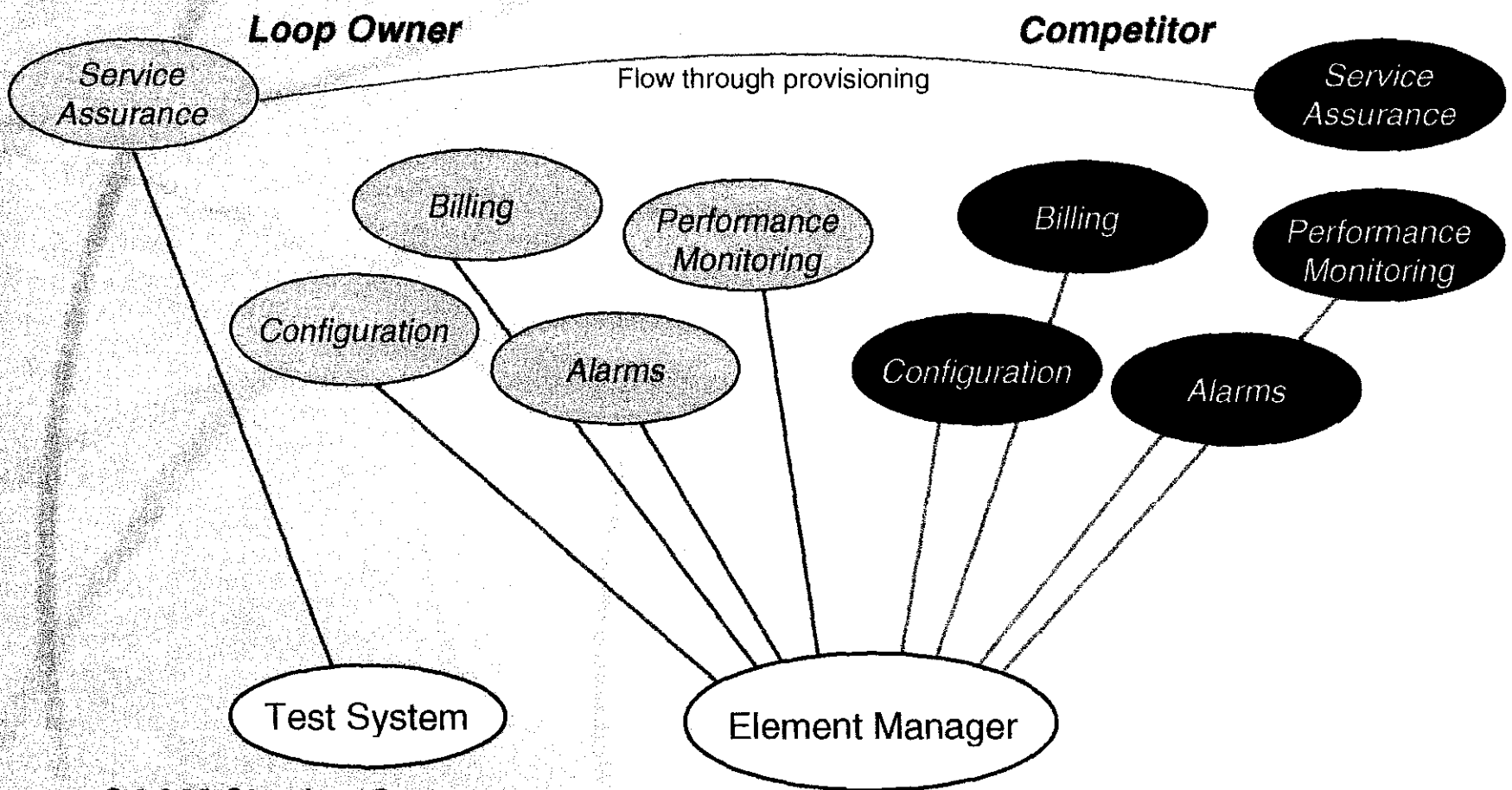
Model for Integrated Voice & Data Sharing Loop and Sub-loop Unbundling



OA&M Sharing Structure

- Security & permissions is provided for multiple access to the element manager MIBS
- Element Mgmt structured to enables access for MIB sharing sharing

Sharing Requirements

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Requirements to promote sharing

- Business Environment and or legislation supporting loop unbundling for both integrated and DSLAM offers
- OA&M infrastructure including standards to support loop sharing

Additional Considerations

- Sharing is not possible on loaded loops
- SLA and maintenance remains the responsibility of the loop owner. This includes insuring for long term loop maintenance and safety. - basic DC parameters must be co-ordinated with the loop owner & include minimum and maximum loop voltage, and current (to provide sealing but within limits so as not to damage the loop or create hazard at service points in the outside plant.

Not Typically Specified but important

- Support for service outside voice band typically (300Hz -3.4KHz loss, loss at 1KHz and slope to 3.4KHz -10 & -9dB on RDA loops and noise floor < 30dBrnC noise to ground 90dBrnC and max power on loop -9dBm over 3 sec. etc.).
- Loop quality (loss in data band)
- Interference ingress crosstalk limits in band (protection for competitor)
- Interference egress coupling limits in band (protection for loop owner)

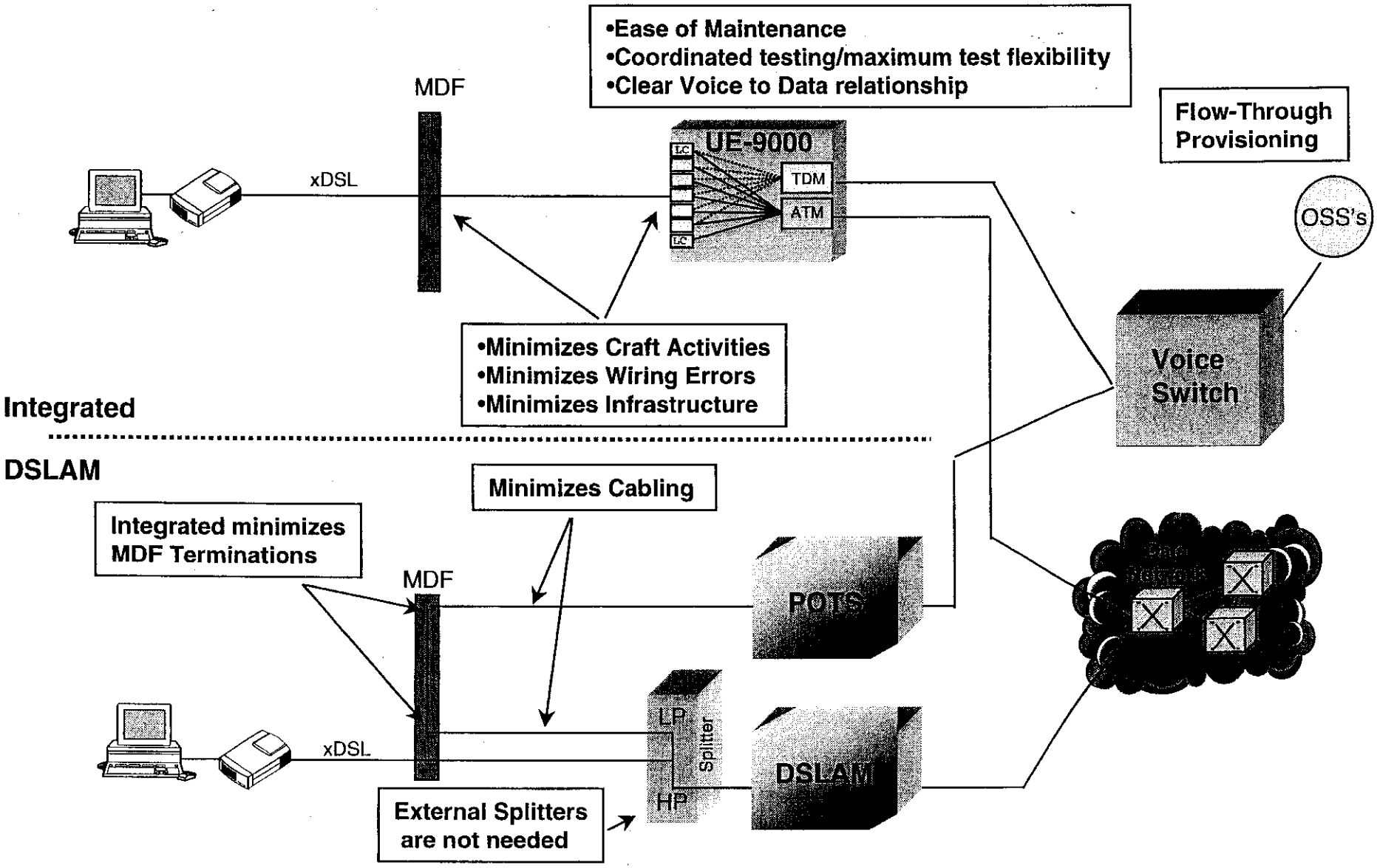
Quantified Value of Voice and Data Integration

Cost Reduction Opportunity	Initial Savings	Recurring Savings
Voice and Data Combined in a Single Bay		
less equipment	$50	
H/W Installation savings	$18	
Service Provisioning		
COSMOS ILC assignment	TBD	TBD
Single versus Double jumpering	$12	
Ongoing Maintenance		
Fewer cable runs, loop testing on single test head simplifies maintenance	$21	$21
TOTAL Savings per Line	$101+	$21+

Primary Values of an Integrated Line Card to provide ADSL and POTS Solutions

- Reduced Capital Equipment Costs
- Redeployment of Existing Assets
  - Utilize vacated POTS equipment
  - Integrated testing of voice and data via single test head
- Re-use of existing C.O. service order processing and C.O plant assignment
- Flow-through Data Provisioning
- Reduced MDF wiring and Floor Space

Value of Integrated Line Card in Central Office



UE 9000 ADSL/G.Lite leverages existing operations
==> Reducing costs

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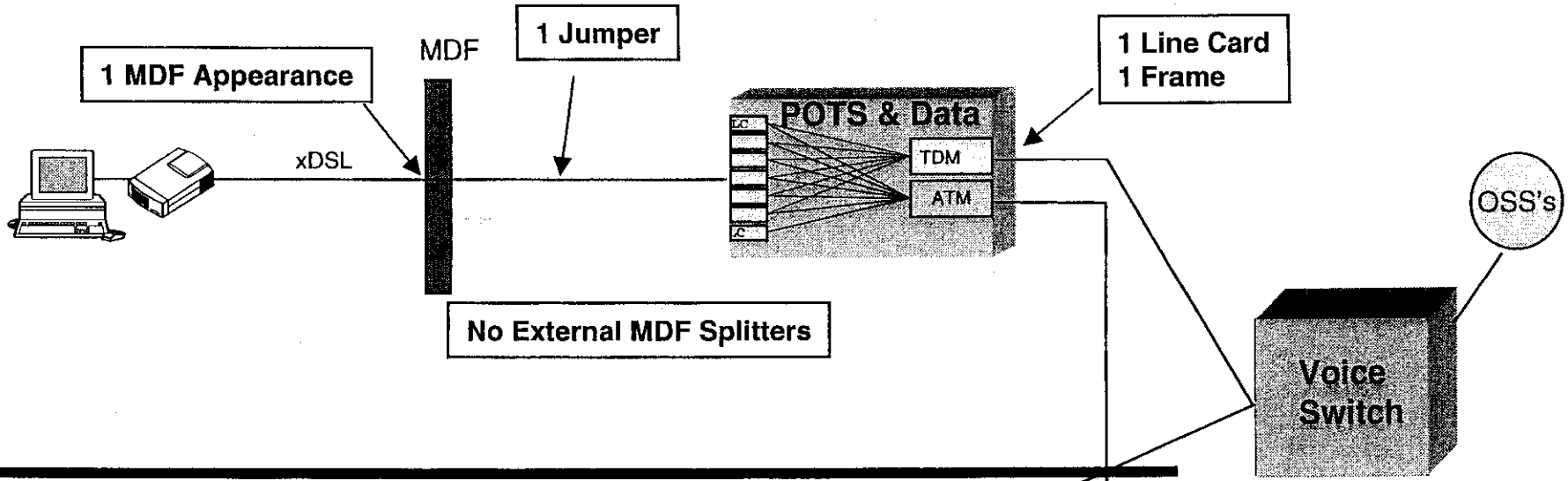
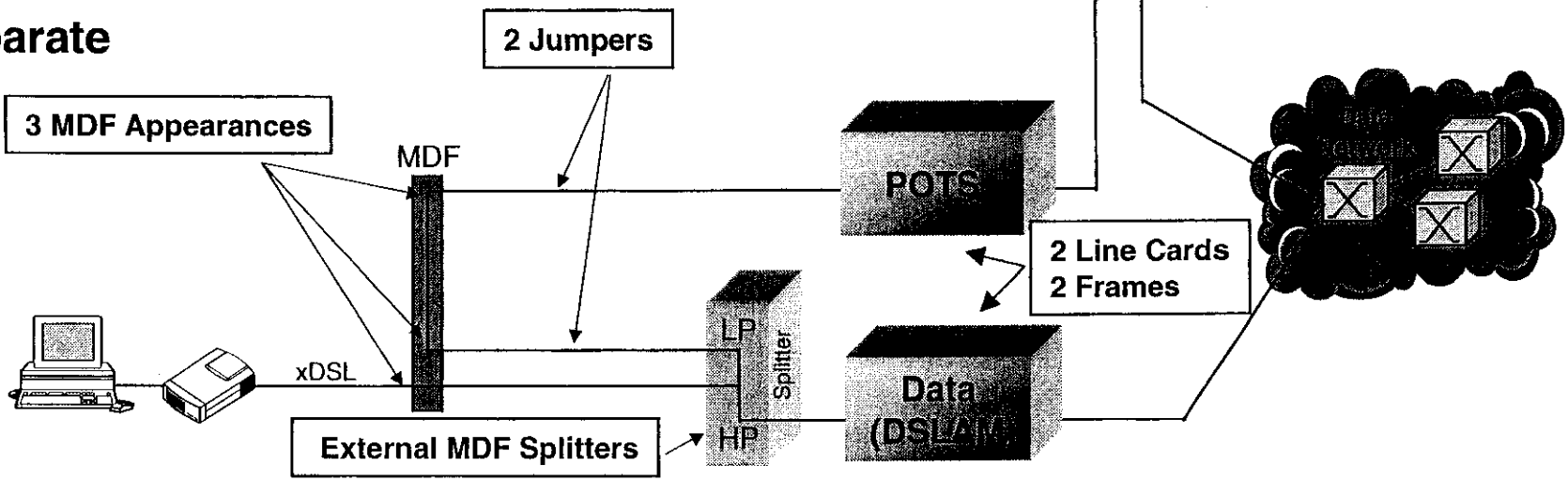
June 3, 1999

Network Components For Voice & Data Service

Integrated



Separate



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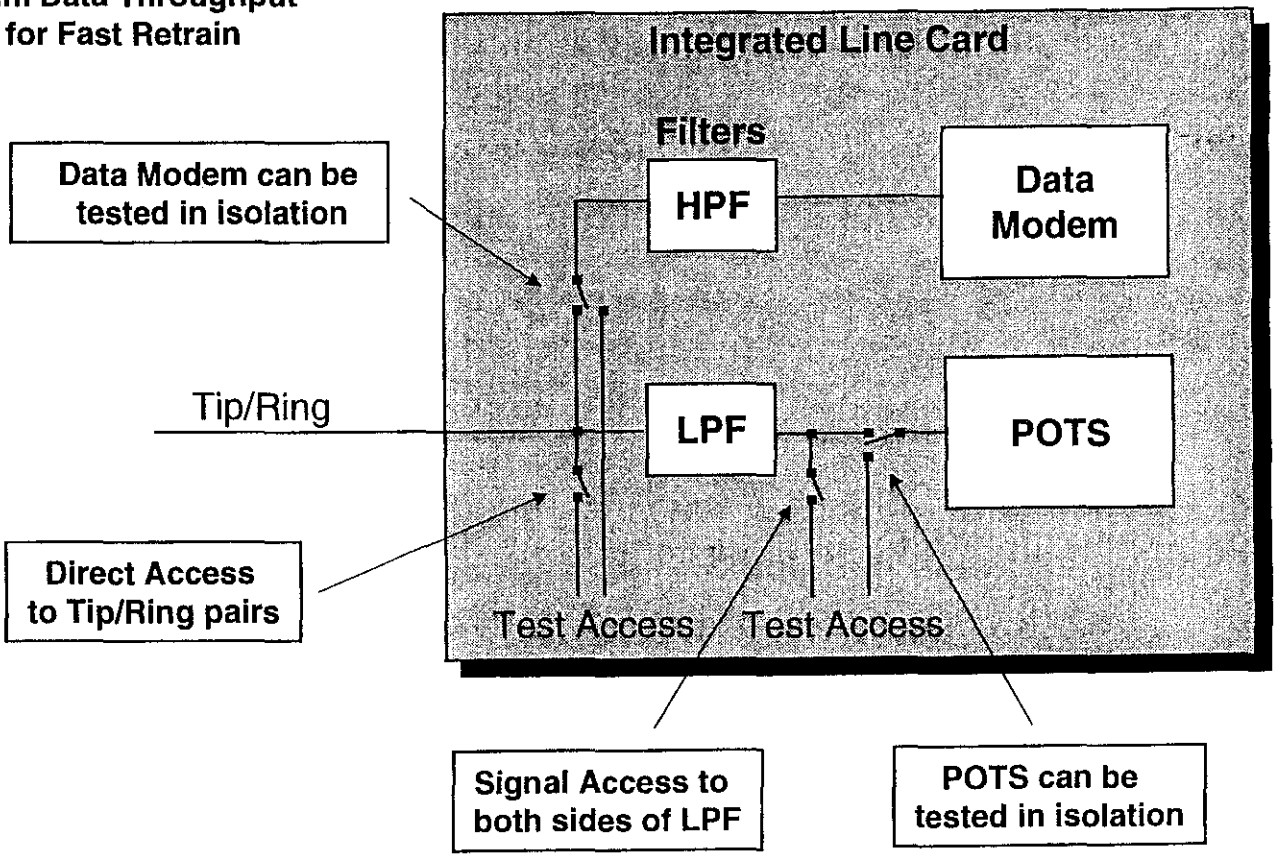
Value of Integrated Line Cards

Special Features:

- Filters are optimized for maximum Data Throughput
- Ringing and Off-Hook Detection for Fast Retrain
- Power-Line Cross Protection

Testing:

- Maximum Test Flexibility
- Coordinated Testing



Integrated voice and data line cards reduce the complexity of testing and troubleshooting circuits

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